

SEP 7, 1984

Mr. Steve Reuter
Indiana State Government
Division of Land Pollution Control
1330 West Michigan street
Indianapolis, IN 46206

Dear Mr. Reuter:

In your August 9th telephone conversation with Judy Gordon about the wastewater treatment unit exemption, you asked about the status of the "process wastewater" definition relevant to this exemption. You also inquired whether leachate could or should be considered wastewater.

As you have noted, one of the problem areas in implementation of the exemption is the definition of "wastewater." In 1981, we provided the EPA Regions with a general definition of wastewater. (See the attached copy of John Lehman's memo of July 31, 1981 to Richard Boynton, Region I.) On February 2, 1982, the process wastewater definition was proposed by EPA. Since that time no further action has been taken; that *is*, the proposal was never amended, finalized or withdrawn.

The wastewater treatment unit exemption is now under study. One goal of this project is to formulate a better definition of "wastewater" for use as guidance in implementing the exemption.

Your question about a leachate treatment system involves some of the issues that are now under study. Current interpretations could change as a result of this study. Therefore, we cannot provide a definitive answer until our deliberations are complete. We are working to resolve these issues as quickly as possible, and we shall keep you informed.

Sincerely,

Donald C. White, Program Manager
Treatment, Recycling & Reduction Program
Waste Treatment Branch (WH-565A)

Enclosure

FaxBack 11041

